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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	(Jointly Administered)
-----	X	

**JOINDER OF
HAIN CAPITAL HOLDINGS, LTD.
TO OBJECTION OF DEUTSCHE BANK AG
AND AFFILIATES TO MOTION OF PLAN ADMINISTRATOR
TO ESTIMATE CLAIMS FOR RESERVE AND DISTRIBUTION PURPOSES**

Hain Capital Holdings, Ltd. ("Hain Capital"), hereby joins in the Objection of Deutsche Bank AG and its affiliates, dated March 21, 2017 (the "DB Objection") to the *Motion of Plan Administrator Pursuant to Sections 8.4., 9.3., and 14.1 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes*, dated February 23, 2017 [ECF No. 54094] (the "Recent Motion"), to the extent the Recent Motion is deemed relevant to the *Motion of the Plan Administrator Pursuant to Sections 8.4, 9.3, and 14.1 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes*, dated June 10, 2015 [ECF No. 49954] (the "Initial

Motion”) and Hain Capital’s Objection to the Initial Motion [ECF No. 50259] (the “Initial Objection”).¹

For the reasons set forth in the Initial Objection and DB Objection, Hain Capital respectfully requests that the Initial Motion be denied.

Dated: March 23, 2017
New York, New York

BROWN RUDNICK LLP

/s/ Howard S. Steel
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¹ Under the Initial Objection, Hain Capital joined in the *Objection of Newport Global Opportunities Fund L.P. and Newport Global Credit Fund (Master) L.P. to the Motion of Plan Administrator Pursuant to Sections 8.4, 9.3, and 14.1 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors to Estimate Claims for Reserve and Distribution Purposes* [ECF No. 50258], which objection is still pending.